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VS, APHIS
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Re: National Animal Identification System, Docket No. 05-015-1

As President & CEO of the Oklahoma Farmers Union, I take this opportunity to share the perspective of 100,000 strong family memberships of the organization regarding proposals to create a National Animal Identification System.

OFU supports implementation of the recommendation's known as the United States Animal Identification Plan (USAIP), submitted by the Cattle Working Group (CWG).

Delegates to the OFU Convention adopted the following policy in February 2005:

“In the interest of food security, animal health and producer economic stability, we support a government funded and managed, cost-share, premise animal identification program for disease and bio-terrorism trace-back only that is least burdensome to producers while maintaining producer confidentiality.”

From the outset, we encourage full participation and shared responsibility throughout the industry and recommend the following relative to the key issues you have identified for comment:

Financial

Any system should have the least possible cost to producers. OFU considers animal identification to be a food safety and homeland security issue affecting all Americans and therefore supports full federal funding for the entire infrastructure of such an effort. At minimum, the expense of the overall infrastructure of the databases and means of collecting, storing and maintaining that data should be at the expense of state and/or federal governments.

We must ensure adequate funding for state animal health officials charged with the responsibility of establishing a premise identification system. Full reimbursement costs to the states should be a priority. Equally, full federal funding should exist for the operation of the database and associated management components.

Confidentiality

FOIA Exempt: Producer's data/information must be kept confidential/exempt from current Freedom of Information Act (FOIA) requirements. Only approved animal health authorities at the federal and state level should have access to the USAIP information system.

Government Management: Only information essential to the enhancement of animal disease surveillance and monitoring should be stored in any state or federally managed database under the USAIP. This federal and state government secured information should have accessibility limited to disease and bio-terrorism trace-back/trace-forward only.

Premises Allocation System: All premises that manage and/or hold cattle should be identified through the State or Tribal animal health authority. This premise identification is a prerequisite to individual animal identification, and thus, must be initiated to meet the requirements of the U.S. Animal Identification Number System. This function must be one of government and not private entities – companies or associations.

Data Management: No one entity should have all information to connect the dots independently. The data bank should be user-friendly, managed and maintained by government agencies. The data management system should be practical and applicable to both inclusion of data obtained from producers in rural America and the extraction of data from the database by professionals charged with that responsibility. The Federal Government should aid in the development of a user-friendly program for state health officials to utilize in developing their own state's premise identification system.

Data management should be a function of government and no other private entity. Should any component of this activity be opened for competitive bidding, it could go to a cattle association, a general farm organization or even an animal rights group. We should not go down this path. This opens the door to politics in determination of successful bidders, infiltration by non-friendly groups toward production agriculture and the possible compromise and breach of confidentiality leading to market disruption, manipulation and/or influence on prices.

There should be a mandated harmonization of technology with adequate and acceptable standards with whatever system and means of identification that is selected. This harmonization should be not only for U.S. systems but with trading partners and particularly of priority trading partners which have common borders with the United States. Should they choose not to utilize our system, those animals should be re-tagged using our system.

Uniformity: There must be uniformity of the identification system with tracking equipment. The RFID ear tags appear to be the most practical technology today to automate the collection of individual animal identification for cattle. However, we remain receptive to evolving technologies. The RFID code (3 digit country code or manufacture code and 12 digit animal number) imbedded in the transponder is to be printed on the RFID tag. These official identification devices should be distributed under a certified USAIN distributor, but be readily available for producers to purchase. For example, a producer must be able to buy tags within the retail sector of the marketplace on the spur of the moment and register to a premise. Tag distribution should not be a function of an association. No one association or affiliated entities should profit from the sales and distribution of tags. If not government distribution of these tags, then such tags should be provided by the private sector, achieving maximum competition in the marketplace, which results in savings for the producer.

Reporting Cattle Movements: The minimum requirements for the reporting of cattle movements are all cattle that move interstate must be officially identified and their movement reported to the National Animal Identification Database. Additionally, all cattle that change ownership, in which cattle are moved to a different premise or are co-mingled with cattle from different owners must be officially identified and their movement reported to the National Identification Database. Again, this function should be conducted by the USDA. The combined logistical issues of location, management and transportation may mean that individual ID, when required, gets installed at some later point at the receiving facility and recorded by the buyer for the seller (against the selling facility's premise number), as a condition of trade.

Flexibility

Success of this initiative will only result with uniformity. In as much, if existing identification systems parallel the national initiative, perhaps existing identification systems could be integrated. It is certainly important for individual producers to have the ability to utilize their own data in herd management and daily operations of their farm and ranch operations.

Liability

Appropriate liability protection must be put into place to protect compliant producers and to protect producers when an issue may have arisen beyond the farm gate or perhaps even occurred prior to the arrival at their own farm gate, which he or she should not be responsible for. Those producers, feeders, processors and/or final suppliers to consumers who willfully compromise and create these issues should bear that responsibility; but clear and distinct lines of who is at fault should be defined with no question as to who would bear responsibility in the event of an issue occurring.

Thank you for this opportunity to comment on the proposed National Animal Identification Plan and associated issues of operation and implementation.

Sincerely,

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President & CEO

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